

(Letterhead)

Wednesday, December 8, 2004

VIA FACSIMILE 202-690-1527 & Electronic Mail (Chere.Shorter@usda.gov)

Ms. Chere L. Shorter
Standardization Section, Processed Products Branch
Fruit and Vegetable Programs
Agricultural Marketing Service
U. S. Department of Agriculture
1400 Independence Avenue S.W.
Room 0709, South Building: Stop 0247
Washington, D.C.

RE: (Docket # FV-04-334) United States Standards for Grades of Olive Oil

Dear Ms. Shorter:

We are writing to you regarding the proposed new standards for grading olive oil. We are taking this action because we grow olive trees and produce olive oil for sale in the United States.

In our opinion, the media in the United States have done a good job in educating the public to buy "extra virgin" olive oil. Unfortunately, the 1948 United States Standards for Grades of Olive Oil are completely outdated or have no meaning to producers or consumers.

As a producer, we are not asking for any special considerations in the marketing of our olive oil. As the USDA olive oil standard currently exists, we are at a distinct disadvantage when compared to imported olive oils whose labels are often misleading. Misleading labeling allows a significant price advantage for imported

olive oils. As a US grower and producer, we are asking to compete on a level playing field. We are urging the USDA to adopt revised standards for olive oil sold in the United States, as proposed by the California Olive Oil Council in their letter of June 24, 2004. Adoption of these standards will provide consumers the opportunity to compare products equally and make informed purchasing decisions. These standards are in effect in most if not all of the olive oil producing countries. It is time for the United States to adopt these new standards.

Thank you for consideration of these new standards.

Best Regards,

Robert P. Day, Jr.
Owner, Mad Dog Mesa Olive Oil Company